1 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA 2 3 IN RE: BARD IVC FILTERS 4 PRODUCTS LIABILITY LITIGATION MDL Case No. 2:15-md-02641-DGC 5 This Document Relates to Plaintiff(s) Civil Action No. 2:17-cv-02987-DGC Michael Taylor 7 8 STIPULATION OF DISMISSAL WITHOUT PREJUDICE 9 Plaintiff, Michael Taylor, and Defendants, C. R. Bard, Inc., and Bard Peripheral Vascular 10 Inc., file this Stipulation of Dismissal because: 11 A similar case was subsequently filed, for this same Plaintiff, by another attorney, in Case 12 No. 2:16-cy-01777-DGC. 13 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, Michael Taylor, 14 and all Defendants, through their undersigned counsel, that the above-captioned action is 15 voluntarily dismissed, without prejudice, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and without costs or fees to any party. Nothing herein is with prejudice to, or 16 otherwise affects, diminishes or defeats Plaintiff's claims asserted in Case No. 2:16-cv-01777-17 DGC. 18 Dated this 28<sup>th</sup> day of September, 2017. 19 Respectfully submitted, 20 /s/ Jennifer Williams /s/ Richard B. North, Jr. 21 John H. Allen, III- Trial/Lead Counsel Richard B. North, Jr. Nelson Mullins Riley & Scarborough, LLP Jennifer Williams 22 201 17<sup>th</sup> Street NW, Suite 1700 Jackson Allen & Williams, LLP 23 3838 Oak Lawn Ave., Suite 1100 Atlantic Station, Atlanta, GA 30363 (404) 322-6000 Dallas, Texas 75219 24 (214) 521-2300 (404) 322-6050 (Facsimile) (214) 452-5637 (Facsimile) richard.north@nelsonmullins.com tallen@jacksonallenfirm.com Attorneys for Defendants jwilliams@jacksonallenfirm.com 26 Attorneys for Plaintiff 27

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**CERTIFICATE OF SERVICE** 

I hereby certify that on this 28<sup>th</sup> day of September, 2017, a true and correct copy of the foregoing was transmitted electronically to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jennifer Williams

Jennifer Williams